

May 12, 2006

Central Coast Regional Water Quality Control Board
895 Acrovista Place, Suite 101
San Luis Obispo, CA 93401-7906

Regarding City of Lompoc NPDES Permit

Members of the Board

I. The Waste Water from this Plant causes a blockage of flood control carrying Capacity in the Santa Ynez River Channel.

For more than 20 years, I and other Lompoc farmers have pointed out that the discharge of wastewater from the Lompoc Sewer Plant causes the growth of dense groves of trees within the channel that is designed to conduct flood flows through the Lompoc Valley. We have pointed out to the Regional Board that both routine flood operations of Bradbury Dam and the occasional uncontrolled flows entering the river below the Dam cannot be conveyed through this vegetative jungle which extends approximately 1 mile below the sewer outfall without a routine program of removal of the vegetation. Each time the City of Lompoc pledges cooperation with the neighboring landowners expresses its good intentions and no regular maintenance program is instituted.

The Regional Board is in fact not required to comply with CEQA on the condition that its process is the functional equivalent of CEQA. Here, there is no identification of the blockage of the flood control capacity of the channel and no mitigation measures or conditions placed that the discharge not generate vegetative growth that blocks otherwise existing natural flood carrying capacity of the channel. For that reason, your order and conditions do not satisfy the requirements of California law. We have a well-recognized nuisance existing now. Santa Barbara Flood Control has recognized the artificial loss of flood conveyance capacity as a serious public safety threat. Your permit and conditions fail to address the fact that without the sewer discharge the vegetation would not be propagated and your report fails to explain how you can not mitigate for this impact by requiring that the City remove periodically at its expense growth which obstructs the flood control channel which would not exist but for the sewer water discharge.

Government is remarkable, but we place citizens on the governing Board for a reason. Left to its own, government will wait until there is a flood and then promise action. The citizen members of the Board should ask themselves if they (similar to citizens in New Orleans) sitting on similar Boards are not required to ask the question: How is it we can issue the same permit every 5 years and ignore this condition and development and not require the discharger to mitigate and correct the environmental effects of its discharge?

- II. The Lompoc Valley groundwater is salinity impacted. The Basin Plan objectives are a TDS of 1000 for surface waters. Yet for 4 successive renewals of this NPDES Permit you have permitted no progress to be shown in regard to salinity reduction. This plant has exceeded its own 1100 TDS discharge requirement (30 day average) 62 out of 163 periods during the last permit. Page F-6.

Is the TDS requirement an average or a threshold? A casual analysis might conclude that if the average discharge met the requirement that would be satisfactory. The fault in that logic is that the TDS would be higher during the summer when greater recharge is occurring?

Item No. 7 Attachment No. 3
July 7, 2006 Meeting
Reissuance of NPDES Permit -
Lompoc WWTP, VAFB &
Vandenberg CSD

Is the TDS of the discharges higher in the summer than the winter?

We citizens dependent upon groundwater for our farms and livelihood just love it when your staff asks for a Salt Management Plan from Lompoc. If we violated our pesticide or herbicide application permit conditions 62 out of 163 times government using this model would ask us for our plans to reduce the number of violations.

The fact is that Lompoc goes on adding homes and dischargers, has not found one way to reduce the discharge of waste water other than dust control around the waste water plant in the last 4 permits (20 years) Most communities in California have found a way to apply salt laden water to parks, grassy areas, natural vegetation or some other means of providing for reduction in the salts generated by human activity entering the groundwater directly by placing, as Lompoc does, the water in a river bed that recharges the lower valley. Just from a point of view of water conservation and energy conservation, do you really believe that voting for a NPDES Permit ordering a plan to be prepared is likely to result in any reduction in this abuse? Your staff is ordering a plan to be prepared and it is up to the citizen members of the Board to refuse to grant a 5-year permit. Grant a 6 month permit and demand that action be taken by Lompoc to either reduce the salinity of the discharge by land treatment before discharge or to reduce the quantity of salt being discharged to areas where it may enter the groundwater by source control. Strangely enough reducing the discharge reduces the floodway capacity impacts and blockage.

A prior board ordered Lompoc to do a recharge study. They hired some Cal Poly seniors who used this as their senior project. They drew up the Santa Ynez River Plan. The city council accepted it and now says it is inoperative.

Conclusion

Is your Staff really telling you that with the technological improvements in desalinization, land disposal and the increased awareness of how damaging inadequate maintenance of flood features can be to a society and awareness of the preciousness of water resources that you should go on issuing permits to the City of Lompoc with no significant new requirements in this situation? Is your staff really stating that it is fine to dump wastewater in an otherwise dry river channel, create a jungle in a flood control channel with a wastewater discharge because this is the cheapest alternative while allowing new connections to the sewer system? Are you just aboard this ship or do you have your hand on the wheel?

Yours truly,



Steve Jordan
P.O. Box 427
Lompoc, CA 93436